DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Time Start 09:30

Time Finish 15:00

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name ASHLAND SPECIALTY CHEMICAL

EPA I.D. Number PAD987333481 Employer I.D. Number (EIN) _____

Site Address 2650 NEVILLE ROAD, PGH., PA 15225

County ALLEGHENY Municipality NEVILLE TWSP Zip 15225

Name of Inspector JOHN W. KENDALL

Name & Title of Responsible Official JOSEPH M. DICKEY, OPERATIONS MGR.

Person Interviewed THOMAS DICKEY Telephone (412) 778-6339

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: -42177 Pounds _____ Kgs

1. **Site Characterization:**

   STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

   PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

   GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. **Universal Waste:** ☐ Large Quantity Handler ☒ Small Quantity Handler

   Universal Waste Types FLUORESCENT BULBS, BATTERIES

3. **Hazardous Waste Transporters:**

   Transporter Name ASHLAND DISTRIBUTION CO. License Number PAD000797548

   Transporter Name DART TRUCKING CO. License Number OHD009865825

   Transporter Name HUKILL CHEMICAL CORP. License Number OHD001926740

4. **Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
F003,U147,U190	CONTAMINATED DEBRIS FROM CLEAN-UP AND SAMPLING MALEICA/PHTHALIC ANHYDRIDE	AMERICAN ENVIRONMENTAL SVS. MORGANTOWN, WV
D001	SPENT PARTS WASHER SOLN, H2O/ISOPROPYL ALCOHOL EQUIPMENT CLEANING SOLN,OBSOLETE MINERAL SPIRITS	AMERICAN ENVIRONMENTAL SVS. MORGANTOWN, WV
D001, U102, U190	OFF-SPEC POLYESTER RESIN, AND OFF SPEC RESIN CATALYST (PHTHAYL CHLORIDE)	POLLUTION CONTROL INDUSTRIES EAST CHICAGO, IN AMERICAN ENVIRONMENTAL SVS. MORGANTOWN, WV SYSTECH ENVIRONMENTAL

✓ EPA RCRA

		PAULDING, OH
D001, F003	SPENT QC LAB SOLVENT (ACETONE/STYRENE)	AMERICAN ENVIRONMENTAL SVS. MORGANTOWN, WV
D001, F003	FILTER SOCKS/ABSORBENT MATERIAL (STYRENE/VINYL TOLUENE)	AMERICAN ENVIRONMENTAL SVS. MORGANTOWN, WV
D004, D005, D006, D007, D008, D009, D010	SOLID WASTE RESIDUE (FLYASH) FROM VENT LINES CONTAINING LEAD AND SELENIUM	AMERICAN ENVIRONMENTAL SVS. MORGANTOWN, WV
D001	WASHWATER FROM PROCESS EQUIPMENT CLEANING (STYRENE/MALEIC ANHYDRIDE)	GENERAL ENVIRONMENTAL MGT. CLEVELAND, OH
D009	CONTAMINATED DBRIS FROM OBSOLETE PLUMBING REMOVAL CONTAINING TRACE AMOUNTS OF MERCURY	AMERICAN ENVIRONMENTAL SVS. MORGANTOWN, WV

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS

Site Name ASHLAND SPECIALTY CHEMICAL ID Number PAD987333481 Date 07/25/2006

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS 1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
	X			Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
	X			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	X			Exception reporting procedures followed	262a.42	262.42	H016
	X			Spill reporting procedures followed	262a.43	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
	X			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
	X			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name ASHLAND SPECIALTY CHEMICAL ID Number PAD987333481 Date 07/25/2006

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS 1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b)(2)		H037

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name ASHLAND SPECIALTY CHEMICAL ID Number PAD987333481 Date 07/25/2006

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS 1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			**LQG TANKS** (Subchapter J)			
	X			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
	X			Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
	X			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
	X			Tanks labeled to accurately identify contents	265a.194		H044
	X			Required inspections completed and documented in operating log	265a.195	265.195	H045
	X			Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
	X			Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	X			**SQG TANKS**			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
	X			Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
	X			If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
	X			Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
	X			Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
	X			All waste removed at closure	265a.1	265.201(d)	H056
	X			Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
	X			Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	X			Incompatible waste requirements met	265a.1	265.201(f)	H059

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection:07/25/2006 **Identification Number: 301291**

Company/Facility/Site Name: Ashland Specialty Chemical

An inspection of the Ashland Specialty Chemical Co. was performed on Tuesday, July 25, 2006. Representatives for the Department of Environmental Protection were, John Kendall, Solid Waste Specialist and David Leiford, Field Operations Supervisor. Representatives for Ashland were Joseph Dickey, Operations Mgr. and Gregg Campbell, Plant Engineer.

Ashland Specialty Chemical manufactures polyester resins at the company's Neville Island, PA facility. The process presently utilizes two batch reactors, (R-41 and R-42) that mix various amounts of maleic anhydride and/or phthalic anhydride with various glycols, such as ethylene glycol and propylene glycol. The reaction of the acids and glycols is a condensation reaction where an aqueous wastewater is produced. The batches continue through cooling, thinning and blending processes then packaged for customer shipment. The wastewater is stored in a 15,000-gallon capacity storage tank (V-904). The pH of the wastewater is maintained at above 2.00 with addition of aqueous ammonia stored in an adjacent tank (V-970). The wastewater is then incinerated in a captive, permitted Hirt Thermal Oxidizer. The rate of incineration is permitted to 1000 lbs. per hour. The temperature is maintained at or above 1450 degrees F. During this inspection, the incinerator was in service and operating at a temperature of 1504 degrees F. and the pH was at 2.30. Hazardous waste generated during the process is generally from sampling and is collected in drums located at various satellite areas (PR-001, PR-002 and PR-003). When full, the drums are removed and stored in a hazardous waste storage building and transported out for disposal. Occasionally, out of spec batches are pumped directly from blending tanks into tanker trucks for transport and disposal. Residual waste generated throughout the plant that is not incinerated, is collected in drums and roll-off boxes for transporting and disposal at off site facilities.

INSPECTION RESULTS REVEALED THE FOLLOWING:

A. Residual Waste Incinerator and other Processing Facilities:

(1). The facility permit will expire on October 4, 2006 and the facility reps, Joseph Dickey and Gregg Campbell, were informed of this.

B. Hazardous Waste Inspection Report

(1). It was noted that some of the Hazardous Waste manifests were not filled out completely. William Moury was informed of this and the matter will be addressed.

(2). It was also noted that some waste material had entered the drain basins in the loading area on Third St., where product is loaded into trucks for shipment. This should be handled as a hazardous waste. Greg Campbell was informed of this and it will be sumped out.

C. Residual Waste Generator:

(1). Residual waste generated during the cleaning of processing tanks is not allowed under permit conditions to be incinerated and is therefore transported off site for disposal.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analysis or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature):_____ **Date:** ____

Inspector (signature): John W Kenney **Date:** 7/27/2006

March 2006

RCRAInfo CM&E EVALUATION – VIOLATION FORM

*EPA ID Number	PAD987333481			EIN	
Handler Name	ASHLAND SPECIALTY CHEMICAL CO.				
Street	2650 NEVILLE ROAD				
City	PITTSBURGH	State	PA	Zip Code	15225

Actual Generator Status *Check only if different from Notified Status.* LQG ☑ SQG ☐ CESQG ☐ Closed ☐ Non-Handler ☐

Universe Change Required? *(Generator Status Change Required)* YES ☐ NO ☑ If **YES**, complete the Universe Change Section (on reverse side of this form).

RCRA Non-Notifier? YES ☐ NO ☑ If **YES**, complete the Handler Section (on reverse side of this form).

Other Facility Information Changes? YES ☐ NO ☑ If **YES**, complete the Handler Section (on reverse side of this form).

EVALUATION** ● **Add** ☐ **Update** ☐ **Delete** ***You must provide an Evaluation Identifier (also known as the Sequence Number).

*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization
001	CEI	07/25/2006	S	~~PA~~ JWK	WM

Day Zero (mm/dd/yyyy): *You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.* 07/25/2006

Reclassified SV Date: *Only applicable for SNY evaluation type as appropriate.*

Notes: NO VIOLATIONS FOUND

Evaluation Indicator Field *(Check all that apply)*

☐ **Citizen Complaint** ☐ **Multimedia Inspection** ☐ **Sampling** ☐ **Not Subtitle C**

Focused Coverage Areas (Use Only for Evaluation Type FCI)

Regulation-Specific FCI

BIF ☐ CCI ☐ CFI ☐ INC ☐ LDR ☐ PTB ☐ PTX ☐

THI ☐ UIC ☐ UOI ☐ UWR ☐ OTHER (specify): _____

Routine/Standardized FCI

CAR ☐ CPC ☑ DOS ☐ EMR ☐ IEI ☐ ISI ☐ RTI ☐

Does this Evaluation Add/Update/Delete a Violation?	YES ☐ NO ☑	*If Yes, fill in the Violations Section(s) on page 2 of this form.*
Does this Evaluation link to a Commitment?	YES ☐ NO ☑	*If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.*
Does this Evaluation link to a 3007 Request?	YES ☐ NO ☑	*If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.*

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES ☐ NO ☑ *If Yes, fill in information below.*

*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)	*Date Determined (mm/dd/yyyy)

***Required Fields**

EPA ID Number	Handler Name
PAD987333481	ASHLAND SPECIALTY CHEMICAL CO.

VIOLATIONS SECTION
(Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)

VIOLATION ☐ Add ☐ Update ☐ Delete — **Link to Above Evaluation** ☐

Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
				*A RTC Qualifier is **required** if entering an Actual RTC Date.*	

Notes:

LINK CITATIONS TO ABOVE VIOLATION? YES ☐ NO ☐ — ***If Yes, fill in information below***

Citation Type	Citation	Citation Type	Citation

VIOLATION ☐ Add ☐ Update ☐ Delete — **Link to Above Evaluation** ☐

Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
				*A RTC Qualifier is **required** if entering an Actual RTC Date.*	

Notes:

LINK CITATIONS TO ABOVE VIOLATION? YES ☐ NO ☐ — ***If Yes, fill in information below***

Citation Type	Citation	Citation Type	Citation

HANDLER SECTION ***(Fill out if RCRA Non-Notifier)***

Handler Name		**Contact**			
Street					
City		**State**		**Zip Code**	
County					

UNIVERSE CHANGE SECTION ***(Fill out if Universe Change Required)***

i. Indicate the Facility's current Universe(s):

ii. Indicate the new RCRAInfo Generator Universe:
Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.

LQG ☐ SQG ☐ CEG ☐
Non-Handler ☐ Closed ☐

iii. Indicate the new transporter status:
(*Only fill out if the facility requires a transporter status change***)**

Transporter ☐
If the transporter box is checked, you must check at least one mode of transportation below:
☐ Air ☐ Water
☐ Rail ☐ Other
☐ Highway

Non-Transporter ☐
Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.

***Required Fields**

2600-FM-LRWM0276 Rev. 6/98

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 1/28/04
Time Start _____
Time Finish _____

HW- 1304686

HAZARDOUS WASTE INSPECTION REPORT

☑ GENERATOR ☐ S Q GENERATOR

Company name Rohland Chemical Co I.D. Number PAD987333481
Site Address 265p Neville Rd.
County Allegheny Municipality Neville Twp. Zip 15225
Name of Inspector Judy Nolan
Name & Title of Responsible Official Ron Marshalek
Person Interviewed Bill Mourey, Dino DeAngelis Telephone (412) 778-6210
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: > 2200 Pounds _____ Kgs

1. **Site Characterization:**
   STORAGE: ☑ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
   PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
   GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad
2. **Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler
   Universal Waste Types _____
3. **Hazardous Waste Transporters:**
   Transporter Name _____ License Number _____
   Transporter Name _____ License Number _____
   Transporter Name _____ License Number _____
4. **Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
	All previous report	
	9/30/03	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Ashland ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS 1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
				Identification Number	262a.10	262.12	H002
				Authorized transporters only	262a.10	262.12(c)	H003
				Subsequent notification requirements met	262a.12(b)		H004
				Proper manifest used	262a.10	262.21	H005
				Manifests filled out correctly and completely	262a.20		H006
				Manifests signed and routed properly	262a.23(a)	262.23	H007
				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
				Specified records retained for three years	262a.10	262.40(c)	H014
				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
				Exception reporting procedures followed	262a.42	262.42	H016
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				PPC plan developed and implemented	262a.10	262.34(a)	H018
				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
				Source reduction strategy prepared and available (LQG only)	262a.100		H020
				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name _____ ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS 1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
✓				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
				Containers of hazardous waste in good condition	265a.1	265.171	H026
				Containers and stored waste compatible	265a.1	265.172	H027
				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
				Containers managed to prevent leaks	265a.1	265.173(b)	H029
				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
				Container storage areas inspected at least weekly	265a.1	265.174	H031
				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
✓				Proper containment and collection systems in place	265a.179		H033
				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
✓				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
				Containers labeled accurately identify contents	SWMA 6018.403(b)(2)		H037

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HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name _____ ID Number _____ Date _____

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STATUS 1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
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				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
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				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
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				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: 1/28/04 **Identification Number: PAD987333481**

Company/Facility/Site Name: Ashland Chemical Company

On 1/28/04, a follow-up inspection was conducted at this facility. Bill Moury showed me around the facility. We visited the locations of previous violations only. These included the waste storage area, the former waste oil staging area, and the hot oil heater area.

All drums are now labeled and new containment units have been purchased. The waste oil storage area is cleared and Mr. Moury stated that the area will no longer be used for waste oil storage. Contaminated soils in the hot oil heater area and the waste oil storage area have been excavated and are staged in an open lot. These soil piles are frozen at this time but should be staged on tarps and covered to prevent infiltration of rainwater and dispersal of contaminants while they are awaiting disposal. The hot oil heater area is being paved but the project is on hold due to freezing weather.

No violations were noted.

Person Interviewed (signature): Jared **Date:** 2/3/04

Inspector (signature): Judy Nellan **Date:**

ASHLAND
ASHLAND SPECIALTY CHEMICAL COMPANY

Tel: (412) 778-6200
Fax: (412) 778-6225
www.ashspec.com

2650 Neville Road
Pittsburgh, PA 15225

November 10, 2003

Judith Neelan
Solid Waste Specialist
Waste Management
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745

CERTIFIED MAIL NO. 7099 3400 0006 6862 7298

Subject: ***Response to Notice of Violation (NOV) dated 10/17/2003***
Ashland Specialty Chemical Company, Division of Ashland Inc. ("Ashland")
2650 Neville Road
Pittsburgh, PA 15225
EPA ID # PAD 987 333 481

Dear Ms. Neelan,

This letter is Ashland's response to the issues raised in PA DEP's NOV dated October 17, 2003. These issues were noted during a Solid Waste Inspection on 9/30/03 and 10/06/03 at the site referenced above. Summarized below is each alleged violation and Ashland's response.

① *In the drum storage area, eight drums containing filter socks are labeled but not dated as required by 25 Pa. Code Section 262a.10 and 40 CFR Section 262.34(a)(2).*

Ashland's Response: The facility has developed new Hazardous & Non-Hazardous inspection logs for both satellite and final waste accumulation areas. It is now the responsibility of the shift supervisors to conduct these inspections and insure that each drum has the accumulation date once it is moved to the final waste accumulation area. All drums in the hazardous waste storage are labeled properly including the accumulation start date. All affected employees will be retrained in proper waste handling procedures. A copy of the new log is enclosed.

② *In the waste oil storage area, ten drums contained waste oil that has been stored longer than one year according to records of waste oil shipments. Storage of a waste over one year constitutes disposal for which the facility does not have a permit, a violation of Act 97 Section 6018.301 and 6018.302(a) as well as 25 Pa. Code Section 299.113(b) and 287.101.*

Ashland's Response: The facility has developed new Hazardous & Non-Hazardous inspection logs for both satellite and final waste accumulation areas. The waste accumulation weekly inspections now track the storage time for each waste drum to assure compliance. In addition, all affected employees will be retrained in proper waste handling practices.

All of the waste oil in question has been shipped off site for proper disposal.

③ *In the waste oil storage area, three drums of oil were not labeled in violation of Act 97 Section 6018.301 and 6018.302(a) as well as 25 Pa. Code Section 298.22(c).*

Ashland's Response: We have developed new inspection logs which address the following areas: Drums Closed and Sealed; Drums Properly Labeled; Drums Exterior Condition; Any Visible Leaks. The shift supervisors will now be conducting these weekly inspections to heighten our hourly workforce's awareness.

④ *The 2002 Residual Waste Biennial Report does not include all waste streams; specifically, waste oil, VT and water, walnut shells, and soils. For large quantity generators, all residual waste streams should be included on the report as required by 25 Pa. Code 287.52(b)(5).*

Ashland's Response: Ashland respectfully notes that this item does not reflect a violation of the cited regulation. In January 2003, we placed a call to Mr. Dave Eberle of the PADEP. The purpose of this call was to determine if the soil removed from the construction of Ashland's new maintenance shop should be included in the 2002 Residual Waste Biennial Report. According to Mr. Eberle, only routinely generated waste streams are to be reported in the Residual Waste Biennial Report. His response to our question was that we should not include any non-routine waste streams. The VT/water, soil and walnut shells were non-routine residual wastes shipped off site in 2002, and were not included in the 2002 Residual Waste Biennial Report based on Mr. Eberle's direction.

The plant also has a letter on file from a conversation with Mr. Eugene F. Turoczy and Mr. Dave Eberle dated February 1, 2001 wherein Mr. Eberle stated that for the 2000 Biennial Report, we were only required to report those waste streams generated in quantities over 13 tons for the calendar year. Waste oil is not generated in excess of 13 tons at the facility.

⑤ *Waste is on the ground in the hot oil heater area and in the waste oil storage area near the pad. Residual waste on the ground is a violation of Act 97 Section 6018.301 and 302, Section 6018.610(1)(4) and (9), and 25 Pa. Code Section 299.112(c), 299.115(b), and 299.116(c).*

Ashland's Response: We have removed soil near the waste oil storage pad (approximate quantity of soil: 5 ft^3) and segregated it for future disposal. The plant has also initiated a capital project (totaling $100,000) to install concrete containment in the area under the hot oil heater. Soil excavation for this project started on October 31, 2003 and we anticipate the completion of the project on or about (March 30, 2004).

If you have any comments or questions regarding Ashland's response, please do not hesitate to call (412) 778-6210 or email rmarshalik@ashland.com.

Respectfully,

Jack Matson

Jack Matson
Plant Manager
Ashland Specialty Chemical

Environmental
Laboratory
Services, Inc.

1135 Butler Avenue • New Castle, PA 16101

(724) 652-577
FAX (724) 652-381

TCLP CHARACTERIZATION
REPORT DATE: 11/25/03

Customer: Ashland Chemical
Generator: Ashland Chemical
Sample Name: Sample #2 Soil from Hot Oil Tank
Sample Date: 11/18/03
Analysis Date: 11/20/03
Lab Sample #: HW42936

LABORATORY RESULTS
TCLP METALS

Analysis	Result	Regulatory Level	Method
Arsenic, mg/l	<0.05	5.0	EPA 7060
Barium, mg/l	0.55	100.0	EPA 6010
Cadmium, mg/l	<0.01	1.0	EPA 6010
Chromium, mg/l	<0.01	5.0	EPA 6010
Copper, mg/l	<0.01	N.A.	EPA 6010
Lead, mg/l	<0.01	5.0	EPA 6010
Mercury, mg/l	<0.005	0.2	EPA 7470
Nickel, mg/l	0.02	N.A.	EPA 6010
Selenium, mg/l	<0.05	1.0	EPA 7740
Silver, mg/l	<0.01	5.0	EPA 6010
Zinc, mg/l	4.12	N.A.	EPA 6010

Notes: TCLP Metals Extraction was performed in accordance with the test method described in SW846 EPA Method 1311.

Mark Swansiger
Lab Director

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Environmental
Laboratory
Services, Inc.

1135 Butler Avenue • New Castle, PA 16101

(724) 652-57
FAX (724) 652-381

REPORT DATE: 11/25/03

Customer: Ashland Chemical
Generator: Ashland Chemical
Sample Name: Sample #2 Soil from Hot Oil Tank
Sample Date: 11/18/03
Lab Sample #: HW42936

EPA METHOD 8020
LABORATORY RESULTS

Parameter	Result as Received, (mg/kg)	Detection Limit, (mg/kg)
Benzene, mg/kg	<0.25	0.25
Toluene, mg/kg	<0.25	0.25
Ethyl Benzene, mg/kg	<0.25	0.25
Xylenes, (Total) mg/kg	<0.25	0.25

Total Petroleum Hydrocarbons, mg/kg	10,038	EPA 418.1
Total Organic Halogens, mg/kg	<50	EPA 9020A

Mark Swansiger
Lab Director

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1135 Butler Avenue • New Castle, PA 16101

(724) 652-577
FAX (724) 652-381

REPORT DATE: 10/21/03

Customer: Ashland Chemical Co.
Generator: Ashland Chemical Co.
Sample Name: Soil Sample #2 South of IPA
Sample Date: 10/16/03
Lab Sample #: HW42533

EPA METHOD 5035/8260B
LABORATORY RESULTS

Parameter	Result as Received, (mg/kg)	Detection Limit, (mg/kg)
Benzene, mg/kg	<0.1	0.1
Naphthalene, mg/kg	<0.2	0.2

Mark Swansiger
Lab Director

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1135 Butler Avenue • New Castle, PA 16101

(724) 652-57
FAX (724) 652-38

REPORT DATE: 10/21/03

Customer: Ashland Chemical Co.
Generator: Ashland Chemical Co.
Sample Name: Soil Sample #2 South of IPA
Sample Date: 10/16/03
Lab Sample #: HW42533

Polynuclear Aromatic Hydrocarbons

Parameters	Results (mg/kg)	Detection Limits (mg/kg)
Anthracene	<0.05	0.05
Benzo(A)Anthracene	4.00	0.25
Benzo(A)Pyrene	0.94	0.25
Benzo(B)Fluoranthene	0.72	0.25
Benzo(GHI)Perylene	0.27	0.25
Chrysene	4.56	0.25
Fluorene	<0.05	0.05
Phenanthrene	<0.05	0.05
Pyrene	0.82	0.25

Mark Swansiger
Lab Director

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FAX (724) 652-381

TCLP CHARACTERIZATION
REPORT DATE: 11/25/03

Customer: Ashland Chemical
Generator: Ashland Chemical
Sample Name: Sample #1 Soil from Hot Oil Tank
Sample Date: 11/18/03
Analysis Date: 11/20/03
Lab Sample #: HW42935

LABORATORY RESULTS
TCLP METALS

Analysis	Result	Regulatory Level	Method
Arsenic, mg/l	<0.05	5.0	EPA 7060
Barium, mg/l	0.54	100.0	EPA 6010
Cadmium, mg/l	<0.01	1.0	EPA 6010
Chromium, mg/l	<0.01	5.0	EPA 6010
Copper, mg/l	<0.01	N.A.	EPA 6010
Lead, mg/l	<0.01	5.0	EPA 6010
Mercury, mg/l	<0.005	0.2	EPA 7470
Nickel, mg/l	0.02	N.A.	EPA 6010
Selenium, mg/l	<0.05	1.0	EPA 7740
Silver, mg/l	<0.01	5.0	EPA 6010
Zinc, mg/l	3.86	N.A.	EPA 6010

Notes: TCLP Metals Extraction was performed in accordance with the test method described in SW846 EPA Method 1311.

Mark Swansiger
Lab Director

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Services, Inc.

(724) 652-577
1135 Butler Avenue • New Castle, PA 16101
FAX (724) 652-381

REPORT DATE: 11/25/03

Customer: Ashland Chemical
Generator: Ashland Chemical
Sample Name: Sample #1 Soil from Hot Oil Tank
Sample Date: 11/18/03
Lab Sample #: HW42935

EPA METHOD 8020
LABORATORY RESULTS

Parameter	Result as Received, (mg/kg)	Detection Limit, (mg/kg)
Benzene, mg/kg	<0.25	0.25
Toluene, mg/kg	<0.25	0.25
Ethyl Benzene, mg/kg	<0.25	0.25
Xylenes, (Total) mg/kg	<0.25	0.25
Total Petroleum Hydrocarbons, mg/kg	7,383	EPA 418.1
Total Organic Halogens, mg/kg	<50	EPA 9020A

Mark Swansiger
Lab Director

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Services, Inc.

(724) 652-577
1135 Butler Avenue • New Castle, PA 16101
FAX (724) 652-381

REPORT DATE: 10/21/03

Customer: Ashland Chemical Co.
Generator: Ashland Chemical Co.
Sample Name: Soil Sample #1 East of Hot Oil Heater
Sample Date: 10/16/03
Lab Sample #: HW42532

EPA METHOD 5035/8260B
LABORATORY RESULTS

Parameter	Result as Received, (mg/kg)	Detection Limit, (mg/kg)
Benzene, mg/kg	<0.1	0.1
Naphthalene, mg/kg	0.77	0.2

Mark Swansiger
Lab Director

Environmental
Laboratory
Services, Inc.

(724) 652-5770
1135 Butler Avenue • New Castle, PA 16101
FAX (724) 652-3814

REPORT DATE: 10/21/03

Customer: Ashland Chemical Co.
Generator: Ashland Chemical Co.
Sample Name: Soil Sample #1 East of Hot Oil Heater
Sample Date: 10/16/03
Lab Sample #: HW42532

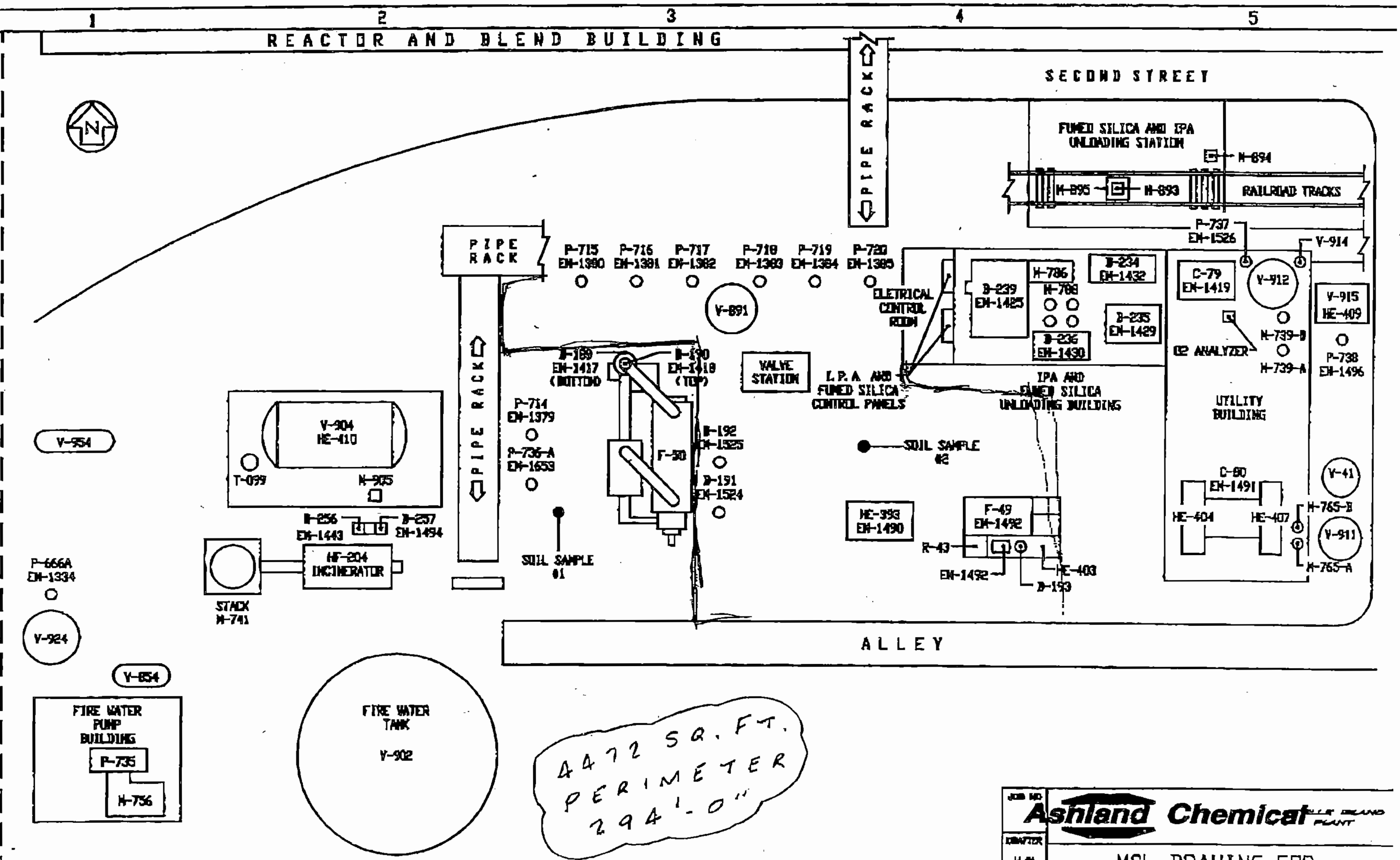
Polynuclear Aromatic Hydrocarbons

Parameters	Results (mg/kg)	Detection Limits (mg/kg)
Anthracene	0.99	0.25
Benzo(A)Anthracene	2.41	0.25
Benzo(A)Pyrene	2.62	0.25
Benzo(B)Fluoranthene	4.90	0.25
Benzo(GHI)Perylene	2.19	0.25
Chrysene	2.80	0.25
Fluorene	0.26	0.25
Phenanthrene	1.42	0.25
Pyrene	2.49	0.25

Mark Swansiger
Lab Director

19 TOTAL P.20

THIS AREA RESERVED FOR TWO 3/8" BINDER HOLES 1/2" IN FROM LEFT AND 8-1/4" C-C



NOTIFY SUPERVISOR DESIGN AND PROJECT ENGINEERING OF ANY UPDATES REQUIRED ON THIS DRAWING

REV		DATE	DESCRIPTION				

Ashland Chemical

DRAFTER: W.M.

DATE: 9/94

MSL DRAWING FOR:
POLYESTER RESINS PLANT
UTILITIES AREA

DWG: 32-01

2500-FM-LRWM0276 Rev. 5/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 1/28/04
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☑ GENERATOR ☐ S Q GENERATOR

Company name Ashland Chemical Co I.D. Number PAD987333481
Site Address 2650 Neville Rd.
County Allegheny Municipality Neville Twp. Zip 15225
Name of Inspector Judy Nulan
Name & Title of Responsible Official Ron Marshalek
Person Interviewed Bill Mourey, Dino DeAngelis Telephone (412) 778-6210
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: 7 2200.0 Pounds _____ Kgs

1. **Site Characterization:**

STORAGE: ☑ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. **Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. **Hazardous Waste Transporters:**

Transporter Name _____ License Number _____
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. **Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
	All previous report 9/30/03	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Ashland ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
				Identification Number	262a.10	262.12	H002
				Authorized transporters only	262a.10	262.12(c)	H003
				Subsequent notification requirements met	262a.12(b)		H004
				Proper manifest used	262a.10	262.21	H005
				Manifests filled out correctly and completely	262a.20		H006
				Manifests signed and routed properly	262a.23(a)	262.23	H007
				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
				Specified records retained for three years	262a.10	262.40(c)	H014
				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
				Exception reporting procedures followed	262a.42	262.42	H016
				Spill reporting procedures followed	262a.10	262.34(d)	H017
				PPC plan developed and implemented	262a.10	262.34(a)	H018
				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
				Source reduction strategy prepared and available (LQG only)	262a.100		H020
				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name _____ ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
✓				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
				Containers of hazardous waste in good condition	265a.1	265.171	H026
				Containers and stored waste compatible	265a.1	265.172	H027
				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
				Containers managed to prevent leaks	265a.1	265.173(b)	H029
				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
				Container storage areas inspected at least weekly	265a.1	265.174	H031
				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
✓				Proper containment and collection systems in place	265a.179		H033
				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
✓				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
				Containers labeled accurately identify contents	SWMA 6018.403(b)(2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name _____ ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS 1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: 1/28/04 **Identification Number: PAD987333481**

Company/Facility/Site Name: Ashland Chemical Company

On 1/28/04, a follow-up inspection was conducted at this facility. Bill Moury showed me around the facility. We visited the locations of previous violations only. These included the waste storage area, the former waste oil staging area, and the hot oil heater area.

All drums are now labeled and new containment units have been purchased. The waste oil storage area is cleared an Mr. Moury stated that the area will no longer be used for waste oil storage. Contaminated soils in the hot oil heater area and the waste oil storage area have been excavated and are staged in an open lot. These soil piles are frozen at this time but should be staged on tarps and covered to prevent infiltration of rainwater and dispersal of contaminant: while they are awaiting disposal. The hot oil heater area is being paved but the project is on hold due to freezing weather.

No violations were noted.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analysis or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature): faxed **Date:** 2/3/04

Inspector (signature): Judy Nellan **Date:** _____

2500-FM-LRWM0276 Rev. 5/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 9/30/03
Time Start _____
Time Finish _____

FAX: 412 778-6225

HAZARDOUS WASTE INSPECTION REPORT

☑ GENERATOR ☐ S Q GENERATOR

PAD 987333481

Company name Ashland Chemical Co. I.D. Number 301291
Site Address 2650 Neville Rd.
County Allegheny Municipality Neville Twp. Zip 15225
Name of Inspector Judy Nelson
Name & Title of Responsible Official Ron Marshalek
Person Interviewed Ron Marshalek, Dino DeAngelis Telephone (412) 778-6210
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: > 2,200 Pounds _____ Kgs

1. **Site Characterization:**

STORAGE: ☑ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. **Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler
Universal Waste Types fluorescent bulbs, batteries

3. **Hazardous Waste Transporters:**
Transporter Name Ashland Distribution License Number _____
Transporter Name Petroclean License Number _____
Transporter Name _____ License Number _____

4. **Types of hazardous waste generated and destination facility (location & type).**

~~Waste Code~~ Destination	Waste Description	Destination Facility
Rimeco	polyester resin cont. material	D001 F003
Rimeco	lab solvent waste	D001 F003
Hukill/Rimeco	spill material	U147, U190
	solid lab waste	U147, F003
Rimeco	filter socks/absorbents	D001, F003
Von Roll?	contaminated debris	F003, U147 U190
Ashland	parts washer	D006

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Ashland ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
✓				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
	✓			Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
✓				Manifests filled out correctly and completely	262a.20		H006
✓				Manifests signed and routed properly	262a.23(a)	262.23	H007
✓				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	✓			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	✓			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
✓				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
✓				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
	✓			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
✓				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	✓			Exception reporting procedures followed	262a.42	262.42	H016
	✓			Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
✓				Source reduction strategy prepared and available (LQG only)	262a.100		H020
	✓			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name _____ ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
			✓	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
✓				Containers of hazardous waste in good condition	265a.1	265.171	H026
✓				Containers and stored waste compatible	265a.1	265.172	H027
✓				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
✓				Containers managed to prevent leaks	265a.1	265.173(b)	H029
✓				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
✓				Container storage areas inspected at least weekly	265a.1	265.174	H031
✓				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
		✓		Proper containment and collection systems in place	265a.179		H033
✓				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			✓	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
✓				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
✓				Containers labeled accurately identify contents	SWMA 6018.403(b)(2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name _____ ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS 1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

AIR EMISSIONS-SUBPART AA, BB and CC CHECKLIST

Subpart AA

Background: If a facility (TSD or LQG) manages hazardous wastes greater than 10 ppmw of organics in a process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air or steam stripping, Subpart AA may apply. Subpart AA would not apply in a bona-fide closed loop scenario at LQGs and TSDs. To comply, the facility would need to determine if the process vent(s) releases greater than 3.0 lbs/hr and 3.1 tons/year of organic air emissions to the atmosphere.. If it does not release that much then the facility is in compliance with Subpart AA. If its emissions are greater, then a control device is necessary to bring the facility into compliance. The control device may be a condenser, flare, carbon absorber, etc... that brings the equipment's emission rate below the 3.0 lbs/hr **and** 3.1 tons/year, **or** reduces the organic emissions by 95 %.

Objective: The Inspector should try to determine if Subpart AA applies at a particular facility and, if applicable, evaluate the facility's efforts to achieve compliance. Has the facility calculated or measured the organic emissions from all vents and compared that with the emissions limit?

1.(a) Is this facility a Large Quantity Generator ✓ Interim Status TSD___or Permitted TSD___**If NO, do not continue with the RCRA Air Emissions checklists.**

2.(a) Does the facility have any hazardous waste management unit using the following processes: distillation, fractionation, thin-film evaporation, solvent extraction, air stripping and steam stripping? ___YES ___NO. **If NO, then proceed to the Subpart BB checklist.**

If YES, list each process vent that is associated to one of the processes.

(b) Are any of these processes exempt under the closed loop recycle exemption?
___YES___NO
If YES, please explain

(c) Does the hazardous waste contain greater than 10 ppmw organics? ____ YES
____NO.

(d) For those process vents with a yes answer to 2(c) describe the waste(s), unit(s) and processes.

(e) Identify those process vents with a no answer to 2 (c), and describe the information/ documentation used to make the determination (collect this information and submit to
EPA).

3(a) Is the total hourly emission rate of the affected process vents greater than 3 lb/hr? ___YES ____NO

and

(v) Is each sensor checked daily or equipped with an audible alarm that is checked monthly to ensure that it is functioning ?____YES ___NO

(vi) If a leak is detected , is the system repaired on the 5/15 requirement? ____YES ____NO

16. Does the facility have any pump operating at NDE? ____YES ____NO
If YES
(a) Is there any externally actuated shaft penetrating the pump? ___YES _____NO

(b) Was the pump tested for compliance with NDE? ____YES ____NO

17. Does the facility have any pumps that is equipped with a closed vent system capable of capturing and transporting any leakage from the seal/seals to a control device?____YES _____NO (these are exempt from 264/265 § 1052(a) through (e) requirements)

_____18. Is each valve in light liquid service or gas/vapor service monitored monthly/quarterly for leaks? _____YES _____NO

____ 19. Is any of the valves in light liquid service being monitored using the alternative methods specified in the regulations? ____YES ____NO

EQUIPMENT IN HEAVY LIQUID SERVICE

_____20.Are pumps, valves in heavy liquid service, pressure relief ____ devices in light liquid or heavy liquid service and flanges and other connectors in light or heavy liquid servicemonitored for leaks by visual, olfactory, or any other detection method? ____YES____NO

SUBPART CC OVERVIEW

The Subpart CC regulations apply to Large Quantity Generators and Treatment, Storage and/Disposal Facilities that manage Hazardous Waste of Volatile Organic Concentration of 500ppmw or more on an average annual basis in Tanks and Containers.

For Tank Storage, there are two levels that a facility may use to manage their waste. Tank Level 1 requires a fixed roof tank which uses a maximum organic vapor pressure to comply with Subpart CC. Tank Level 2 designs can be one of five options. These are: (1)an Internal Floating Roof (2)an External Floating Roof (3) a tank with a Fixed Roof vented through a closed vent system to a control device (4) a Pressure Tank (5) a tank located inside an enclosure that is vented through a closed vent system to an enclosed combustion device.

Most of the facilities will comply with Tank Level 1 which is the easiest to follow. The other option that will be seen a lot would be Tank level 2 Option 3. The other options will be limited to a small number of facilities and should be referred to EPA for inspection. As a result, the emphasis of this checklist has been these two options.

For Container Storage, most of the facilities will store their waste in DOT approved containers. RCRA regulations already cover such storage and as a result, most facilities will be in compliance with the container storage regulations of the Subpart CC regulations.

The checklist does not deal with Surface Impoundments because there are only a few active ones remaining in the Region. These should be referred to EPA for inspection.

RCRA SUBPART CC CHECKLIST FOR AIR EMISSIONS AT LQGS AND TSDS

1. (a)Is this facility a TSD or a Large Quantity Generator (LQG)? √ YES
_____NO

If the answer is no, **STOP**, Air Emissions-Subpart CC regulations do not apply.

2. (a) Are there any units at the facility subject to the CC Rule? ✓ YES __NO

(b)If the answer is no, what is the reason? Ref. 40 CFR 265 § 1080(b) (264 § 1080(b) exceptions or 265 § 1083(c) (264 § 1082(c)) exemptions, or the general exclusions in 265.1(g)/ (264.1(g)), as applicable.

40 CFR 1080(b)exemptions

(1) Unit did not receive HW after 12/6/96 ____
(2) Using containers of less than 26 gallons capacity ____
(3) Unit undergoing closure ____
(4) Units used in an on-site RCRA or CERCLA clean-up ____
(5) Mixed Radioactive and hazardous waste____
(6) Units with CAA, NESHAPS or NSPS controls ____
(7) Tanks with process vents (Subject to Subpart AA) ____

40 CFR 265.1083(c) exemptions:

(8) Waste stream less than 500 ppmw average VOC ____
If so, was waste determination done per 265 § 1084?____YES ____NO
(9)All waste placed in unit meets 268 § 40 (LDR) limits____
(10) Tank is used for bulk feed to incinerator and ____
requirements of 265 § 1083(5)(i)-(iii) are met

40 CFR 265.1 general exclusions/exemptions:

(11) Hazardous waste recycling unit exemption ____
(12) Satelite accumulation area ____
(13) Totally enclosed treatment facility exemption ____
(14) Elementary neutralization unit(corrosive) ____
(15) Waste water treatment in tanks exemption ____
(16) Emergency or spill management exemption ____
(17)Biological treatment with 95 % efficiency ____

Except If exemption is based on (8) above, then **STOP**, subpart CC does not apply.

3. Is the average volatile organic concentration of each waste management unit more than 500 ppmw determined on an average annual basis at point of waste origination? ____YES ____NO

If yes, does the facility have a list each unit and the concentration in its operating record ? If no, indicate if the determination for each unit is in the facility operating record? ____YES ____NO

_____

_____

NOTE : *IF FACILITY CLAIMS THAT ITS WASTE IS BELOW 500PPM, THEN THE WASTE DETERMINATION DOCUMENTATION SHOULD BE IN THE OPERATING RECORD.INSPECTOR SHOULD REVIEW THIS DOCUMENTATION* AND SUBMIT IT TO EPA

FOR EACH UNIT, FOR WHICH A DETERMINATION HAS BEEN MADE THAT THE HAZARDOUS WASTE CONTAINS LESS THAN 500 PPM OF VOCS, ANSWER THE FOLLOWING QUESTIONS.

4. How was waste determination done? Using Knowledge or Sampling? _____ Ref 40 CFR 265 § 1084 (264 § 1083)

(a)If Knowledge was used, is there any documentation on file? _____YES _____NO

(b) Is it adequate? _____Yes ____No

(c) If sampling was used, does the facility have a written sampling plan? _____YES ____NO

(d)(i)If facility used sampling, was the sampling done by an EPA approved method? ____YES _____NO. Which Method? _____

(e)Has the waste stream changed since the initial waste determination was done which would cause the character of the waste to change or to exceed the threshold levels for applicability of Subpart CC? ____YES ___NO

(f) If so, was a new waste determination done? ___Yes ___No
If yes, repeat 4(a)-(e)

TANKS SUBJECT TO SUBPART CC N/A

5. (a)Is HW having an average VO concentration of more than 500 ppmw placed in a tank with either level 1 or level 2 controls? ____YES ____NO (40 CFR 265.1085(b)(1))

Please note: The fixed roof and its closure devices shall be visually inspected by the owner/operator to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the the roof and the tank walls; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. An initial inspection should be done before any waste is stored in the tank and at least once annually thereafter.

6. Were the tanks inspected for leaks before waste was placed into the tank?
___ Yes ___ No. If yes, when was it done? _____

7. During the tank storage of hazardous waste, was an annual inspection done on the tanks described in Question 6? ____Yes
____ No. If yes, when was it done? _____

Indicate options/level for each tank

_____

_____

_____

For tanks with level 1 control:
Tank must meet 3 conditions for level 1 control:

(1) Waste maximum organic vapor pressure less than cutoff for tank design capacity
(2) No heating to or above temperatures at which vapor pressure is determined
(3) No waste stabilization in tank

Vapor pressure is determined by knowledge or by measurement.

Compliance
Status:_____

NOTE: ***INSPECTOR SHOULD CHECK FOR VAPOR PRESSURE DETERMINATIONS, COLLECT INFORMATION AND BRING IT BACK TO OFFICE.***

FOR TANKS WITH LEVEL 2/OPTION 3 CONTROLS
OPTION 3- FIXED ROOF TANK VENTING THROUGH A CLOSED VENT SYSTEM, TO A CONTROL DEVICE THAT WOULD DESTROY OR REDUCE AT LEAST 95% OF VAPORS.

(i) Is the fixed roof forming a continuous barrier over the entire surface area of the liquid in the tank? ____YES ____NO
(ii) Are emissions vented to a control device? ____YES ____NO
(iii) Are all openings in the roof not venting to the control device fixed with a closure device?____YES ____NO

(iv) If the vapor pressure underneath the fixed roof cover is less than atmospheric pressure when control device is working, and the closure device is closed, are there any visible cracks, holes, gaps, or other open spaces between cover opening and closure device?

(v) If the vapor pressure below the fixed roof cover is equal to or greater than atmospheric pressure when the control device is working, are the cover and closure device designed to operate at NDE.

(vi)Are the cover and closure devices closed at all times and the vapor headspace vented to a control device except when O/O is

- performing inspections
- performing maintenance or other normal operations
- accessing the tank
- removing accumulated sludge and other residues from the bottom of the tank.

NOTE: ***INSPECTOR SHOULD COLLECT MONITORING DATA FROM THE CONTROL DEVICE AND THE DESIGN DATA AND BRING IT BACK TO THE OFFICE FOR REVIEW.*** **ALL OTHER OPTIONS, REFER TO EPA**

CONTAINERS:

LIGHT LIQUID SERVICE: For a hazardous waste to be in light liquid service, the vapor pressure of one or more of the organic constituents in the material must be greater than 0.3 Kilopascals at 20 degrees C and the total concentration of pure organic constituents having a vapor pressure greater than 0.3 kilopascals at 20 degrees Centigrade is equal to or greater than 20 percent by weight.

LEVEL ONE:

C There should be no waste stabilization.

- Containers must be ≥ 0.1 cubic meters (26.4 gal) and < or = to 122 gallons . If the organic waste is not in light liquid service, it can be above 122 gallons.

- **OPTION 1**-Meet DOT standards.

- **OPTION 2**-Use a cover and closure device on the container and ensure that there are no visible gaps in the interior of the container or holes in the covers.

- **OPTION 3**-Use vapor supressing barrier on or above the hazardous waste in the container.

LEVEL TWO:

- There should be no waste stabilization.

- Containers are larger than 0.46 cubic meters (122 gal) and are in light liquid service.

- **OPTION 1**-The container must meet DOT specifications.

- **OPTION 2**-Operates with no detectable emissions from the container under Method 21.

- **OPTION 3**-Demonstrated to be vapor tight within the last twelve months using Method 27.

LEVEL THREE

- Container must be used for waste stabilization.

- Vent vapors from containers and remove or destroy them in a control device.

C Put container in a "Procedure T Enclosure" and, vent vapors, and destroy them in a control device.

8. What level of control is your facility using to comply with the Subpart CC regulations?

Level One ✓ Level Two____ Level Three_____

Is the facility in compliance? ✓ YES _____NO

Provide the basis for your determination.

All hazardous was in 55-gallon drums – Lids on RCRA Compliant

*** NOTE: Most facilities will be in compliance if they are not conducting waste stabilization and if they store their waste in DOT approved 55 gallon drums.**

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: 9/30, 10/6/03 **Identification Number: PAD987333481**

Company/Facility/Site Name: Ashland Chemical Company

On 9/30/03 and 10/6/03, a hazardous and residual waste generator, a residual waste incinerator, and a RCRA Subp CC inspection were conducted at this facility. The physical inspection occurred on 9/30/03 and the recordkeeping inspection occurred on 10/6/03. Present were Ron Marshalik and Dino DeAngelis on 9/30/03 and Bill Moury and Dino DeAngelis on 10/6/03. Judy Neelan and Megon Laudenslager represented the Department.

The facility manufactures polyester resins and generates large quantities of hazardous wastes, mainly due to off-sp material. All resin wash solutions are reused onsite. According to Mr. Marshalik, the maleic anhydride process is permanently shut down and will be dismantled within three years. He stated that all tanks are empty.

The facility burns its non-hazardous aqueous waste from manufacturing polyester resins and has a residual waste processing permit to do so. Only one incinerator is operating since the maleic anhydride process is shut down. The incinerator burns approximately one gallon per minute at 1470 degrees and runs continuously seven days per week The pH is kept at about 2.7 by adding treatment chemicals. The facility upgraded its permit on October 9, 2002 to expand its storage for Tank V-904 to 15,000 gallons. According to Mr. Marshalik, the tank is not full and emission from the unit are permitted by Allegheny County.

Physical Inspection:
In the drum storage area, eight drums of hazardous waste containing filter socks are labeled but not dated. Mr. Marshalik and Mr. DeAngelis thought that the drums may have recently come to the area from satellite areas. It should be noted that the same violation occurred during the inspection on 10/10/02.

Also in the area were 10 fiber drums of fluorescent bulbs, 2 drums of "hid" lamps, 1 drum of aerosol cans, as well batteries.

Under the hazardous drums were shallow metal containment units that could hold eight drums or sixteen if stacked two high. The floor under the containment unit is cracked in several places, with one of the cracks being substantia (1/4-inch wide). The containment unit is designed to hold the contents of one drum (55 gallons) if the drums contai liquid hazardous waste. As 40 CFR Section 264.175 states that the containment unit should hold 10% of the waste contained, this would allow the storage of 550 gallons of waste or 11 drums. If greater than 11 drums is stored on these units, the facility should revisit its containment requirements. It should also be noted that if the drums do not contain liquid hazardous waste, the containment requirement does not apply except as indicated in 40 CFR Section 264.175 (d). No containment violations were noted during this inspection.

In the hot oil heater area, oil was on the ground under the piping. According to Mr. Marshalik, this area is destined refurbishment. Until then, the area should be cleaned up to remove obvious contamination and then protected until permanent work can be completed.

In the waste oil storage area, 19 drums and several open 5-gallon containers were present. All drums except those containing RO150 will be disposed.

-Ten drums contained waste oil; three were not labeled,
-One contained Dow-Therm heating oil,
-Four contained diesel fuel and were dated 5/29/02,
-Two were labeled RO150 and contain good oil,
-Two were empty.

At least two 5-gallon pails contained oil and were open to the environment. Near the shed, oil was on the ground alongside the pad.

The facility has a water treatment plant to treat river water for use in the process. Water is used and silt is settled ou and sent to two settling pits where it is eventually pumped out by US Liquids.

Recordkeeping inspection:
Records were generally in very good order.

Hazardous wastestreams include off-spec resins, solvents, maleic acid, filter socks, spill material, compressor blowdown, maleic-contaminated soils and occasional other materials.

Residual wastestreams include polyester resin aqueous waste, clarifier sludge, polyester resin and trash, maintenanc plant trash, asbestos-containing waste, wood pallets, and warehouse plant trash. The Residual Waste Biennial Repo for 2002 does not include non-regulated soils destined for the landfill or walnut shells destined for Vexor Technologies. It also does not include waste oil.

Two shipments of waste were shipped on 4/3/03 and 5/29/03 (on Manifest Document Numbers 04033 and 42330 respectively) to Ashland Distribution Company in Freedom. Please respond as to the character of the wastes shippe and why Ashland was the designated facility.

The facility's last waste oil shipment was on 9/26/01 to Tri-State Petroleum. The shipment prior to that was 4/4/01. This means that the waste oil onsite has been stored greater than one year, the allowable time. The Department also requests the waste oil profiles sent to oil processors used in the past two years.

Air Emission Inspection RCRA Subpart CC:
A RCRA Subpart CC inspection also occurred on this date. As the facility is a large quantity generator, and as the facility's hazardous waste likely contains greater than 500 ppmw VOCs, the facility is subject to these regulations. hazardous wastes are stored in 55-gallon drums with tight-fitting lids. As such, the containers are considered to be under control and facility is in compliance. Should the facility not wish to comply with these regulations, it should either be reclassified as a small quantity generator or provide data that shows that its hazardous wastes do not conta 500 ppmw VOCs. Should any other hazardous wastes be identified, they should be properly managed under these regulations as well.

Residual Waste Incinerator inspection:
Resin water is incinerated onsite at the rate of about 1 gallon per minute. Total waste processed for August, 2003 w 462,450 pounds. The process is permitted by DEP and emissions are permitted by Allegheny County. There is no waste from the process.

Violations:
1) In the drum storage area, eight drums containing filter socks are labeled but not dated as required by 25 Pa. Cod Section 262a.10 and 40 CFR Section 262.34 (a)(2).

records of waste oil shipments. Storage of a waste over one year constitutes disposal (see definition "storage", for which the facility does not have a permit, a violation of Act 97 Section 6018.301 and 6018.302 (a) as well as 25 P Code Section 299.113(b) and 287.201.

3) In the waste oil storage area, three drums of oil were not labeled in violation of Act 97 Section 6018.301 and 6018.302 (a) as well as 25 Pa. Code Section 298.22 (c).

4) The 2002 Residual Waste Biennial Report does not include all wastestreams, specifically waste oil, VT and wat walnut shells, and soils. For large quantity generators, all residual wastestreams should be included on the report a required by 25 Pa. Code 287.52 (b)(5).

5) Waste is on the ground in the hot oil heater area and in the waste oil storage area near the pad. Residual waste o the ground is a violation of Act 97 Section 6018.301 and 302, Section 6018.610(1)(4) and (9), and 25 Pa. Code Section 299.112(c), 299.115(b), and 299.116(c).

A follow-up inspection will occur in about 30 days to monitor compliance.

Any questions or concerns may be addressed to me at 412 442-5802.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violation identified as a result of review of laboratory analysis or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or impl immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the perso was shown the report or that a copy was left with the person.

Person Interviewed (signature): Judy Nelson **Date:** 10/15/02

Inspector (signature): _____ **Date:** _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection Aug. 6, 1997 Time start 11:00 Am Time finish 2:00 PM

Name of Inspector Debbie Churie / Kathy Watson

Company, installation name Ashland Chemical Co

Location Neville Island

County Allegheny Municipality Neville Twp

Identification number PAD987333481

Name of responsible official Ron Marshalik

Title Process Engineer

Mailing Address 2650 Neville Road, Pittsburgh PA 15225

Area code and telephone number (412) 778-6211

Name of person interviewed R. Marshalik / Gene Turoczy

Title Process Engr. / Env. & Safety Tech.

Mailing address *(if different from above)*

Area code and telephone number

1. Current waste handling method:

a.	☐ On-site	☐ treatment,	☐ storage,	☐ disposal	☐ PBR
b.	☐ On-site	☐ use,	☐ reuse,	☐ recycle,	☐ reclaim
c.	☒ Off-site	☐ treatment,	☐ storage,	☒ disposal	
d.	☐ Off-site	☐ use,	☐ reuse,	☐ recycle,	☐ reclaim

2. Amount of hazardous waste produced:
   a. 194,000 LB/'96 ~~kg./mo.~~
   b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D001, F003 POLYESTER RESIN	WTI / LWD	incin KY
U147, U190 MALEIC/PHTALIC ANHYDRIDE	WTI / LWD	"
U147, F003 LAB WASTE	WTI / LWD	"
D001, F003 SOLVENT	Hukill	OH, cement kiln
U147 MALEIC ANHYDRIDE	WTI / LWD	incin KY

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

Part B

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name Ashland Chem. ID Number PAD 987333481 Date 8/6/97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS 1	2	3	4	REQUIREMENT	CHAPTER CITATION	LIN ITE
1				Hazardous waste determination, performed on all waste streams	262.11	H00
1				Identification number	262.12	H00
1				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H00
1				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H00
1				PA manifest used for intrastate shipments	262.20(b)	H00
1				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H00
1				Manifests filled out properly and completely	262.20(g)	H00
1				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H00
1				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H00
1				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H01
1				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H01
		3		Placards offered to transporter	262.33	H01
1				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H01
1				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H01
1				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H01
1				a). All containers of haz. waste in good condition	265.171	H01
1				b). Containers compatible with hazardous waste being stored within	265.172	H01
1				c). Containers of hazardous waste kept closed	265.173(a)	H01
1				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H01
1				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H02
1				f). Haz. waste accumulation areas inspected at least weekly	265.174	H02
1				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H02
1				h). Proper containment and collection system(s)	265.178	H02
1				Containers clearly marked with accumulation date and visible for inspection SEE COMMENTS	262.34(a)(4)	H02
1				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H02

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS 1	2	3	4	REQUIREMENT	CHAPTER CITATION	LIN ITE
1				Records retained at designated location for 20 years	262.40(a)	H02
	2			Quarterly reports submitted to the Department Biennial Report	262.41(a)	H02
		3		Exception reporting procedures followed	262.42	H02
		3		Hazardous waste disposal plan, if required	262.45	H02
1				Spill reporting procedures followed	262.46(a)	H03
1				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H03
		3		Special requirements followed for international shipments	262.50,.53, .55, .60	H03
1				Source reduction strategy prepared and available	262.80	H03

DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Generator Name Ashland Chemical
Date 8/6/97

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

1 = No Violation Observed 2 = Not Applicable 3 = Not Determined 4 = Non-Compliance

Chapter Citation 25 Pa Code	Requirement	Status 1	2	3	4	Line Number
	GENERAL PROVISIONS					
287.6	Designated facility: valid permit? Permit Number (PA) _____	/				3001
287.52(a)	Biennial report submitted by March 1 of each odd numbered year.	/				3002
287.53	Written source reduction strategy on file and in effect.	/				3003
287.53(b)	Waste reduction strategy covers all waste streams.	/				3004
287.53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.	/				3005
287.54	Waste analysis performed: copy on file.	/				3006
287.54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.	/				3007
287.55	Small quantity generator record keeping requirements.		2			3008
287.101(a)	Operation of disposal or processing facility without a permit.		2			3009
	STORAGE REQUIREMENTS					
299.111(1)	Residual waste not mixed with hazardous waste.	/				3010
299.111(2)	Waste stored as not to create a safety risk.	/				3011
299.111(3)	Residual waste not mixed with special handling waste.	/				3012
299.111(4)	Waste not blown or otherwise deposited outside storage area.	/				3013
299.112(c)	Storage area inspected; records available.	/				3014
299.113(a)	All waste stored less than one year.	/				3015
299.114(a)	Equipment maintained in operable condition.	/				3016
299.114(c)	Equipment cleaning frequencies maintained.	/				3017
299.115	Vectors controlled and public nuisances prevented.	/				3018
299.116(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	/				3019
299.116(c)	Waste stored to prevent groundwater degradation.	/				3020
299.121	Sufficient number of properly constructed storage containers.	/				3021
299.122	Storage tank design standards.	/				3022
299.112(d), 299.131(b)	No putrescible waste or liquid waste stored in piles.	/				3023
299.131	Waste storage pile area properly designed, constructed and maintained.	/				3024
299.132	Storage pad or liner system properly designed and maintained.		2			3025
299.133	Proper design and maintenance of leachate and runoff control systems.		2			3026
299.151	Proper storage and containment of incinerator ash residue.		2			3027
299.152	Proper storage and containment of friable asbestos containing waste.		2			3028
299.153	Proper storage and containment of coal ash.		2			3029
299.154	Proper storage and containment of PCB containing waste material.		2			3030

BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT - RESIDUAL WASTE INCINERATORS AND OTHER PROCESSING FACILITIES

te I.D. PAD987333481 (#301291) Telephone # _____

te Name Ashland Chemical Co Operator Name _____

ddress 2650 Neville Rd Address _____

Pittsburgh, PA 15225

unicipality Neville Twp County Allegheny

esponsible Official Ron Marshalik Title Process Engr.

rson Interviewed " ", Gene Turoczy Title " , Env. & Safety

spector D. Chuzie, K. Watson Time 11:00

Due Date	Inspection Date	Inspection Type	Facility Type	Inspector ID	# Violation
	8/6/97	Routine	INCIN		0

mment: _____

rmit Expiration Date 10/4/06 Quarterly Groundwater Due Date NA Days/Week Operated 7

Annual Groundwater Due Date NA

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS 2	3	4	Requirement	CHAPTER CITATION	LINE ITEM
			GENERAL PROVISIONS		
			Facility issued permit from the Department.	297.201(a)	400*
			Operation in accordance with approved plans and permit SEE COMMENTS	297.201(b)	401
			No unapproved wastes accepted.	297.201(c), (e)	402*
			Ban on explosive waste and mixing or storing waste to create a risk of fire, explosion, or hazardous gas adhered to.	297.201(d)	403
			Inspection of loads, maintains records, reports changes to waste analysis plans.	297.203(a)-(c)	404
			DAILY OPERATIONS		
			Proper signs posted. SIGN APPROPRIATE FOR THE FACILITY	297.211(a)	405
			Permit area markers and site perimeter clearly marked and maintained.	297.211(b)-(c)	406
			Proper barriers installed and access controlled when attendant not present.	297.212(a)-(c)	407
			Access road maintained in accordance with Chapter 105 and 283, and negotiable by collection vehicles.	297.213(a)-(h)	408
			Approved means of measuring waste utilized.	297.214(a), (b)	409
			Adequate equipment on-site and standby equipment available.	297.215(a)-(d)	410
2			Approach and unloading areas of adequate size, design and construction.	297.216(a), (b)	411
2			Wheel curb and tie downs at unloading pits.	297.216(c)	412
2			Attendant or signs to direct vehicles.	297.216(d)	413
2			Collection vehicles promptly unloaded.	297.216(e)	414
			Solid waste confined to unloading and approved storage areas.	297.216(f)	415
			Areas within building kept clean	297.217(a), (b), (d), (e)	416

ID Number 301277

Date 8/6/97

INSPECTION REPORT - RESIDUAL WASTE INCINERATORS AND OTHER PROCESSING FACILITIES (Cont'd)

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS 1	2	3	4		CHAPTER CITATION	
1				Plumbing properly maintained, floors well drained.	297.217(c)	4
1				Daily inspection conducted.	297.217(f)	4
1				No open burning (*) or other fugitive dust emissions.	297.218(a), (c)	4
1				Ambient air quality maintained.	297.218(b)	4
1				Effective vector control implemented and public nuisances prevented.	297.219(a), (b)	4
	2			Salvaging in accordance with regulations.	297.220(a), (b)	4
	2			Litter controlled/collected and barriers/fences in place	297.221(a)-(c)	4
				SOIL AND WATER PROTECTION		
1				Surface water (*), groundwater (*), and soil discharges prevented unless otherwise authorized by the Department.	297.231(a), (b), (d), (e)	4
	2			Surface water and groundwater treatment facilities properly operated and maintained as required.	297.231(b)	4
1				Surface or groundwater contact with waste prevented or minimized.	297.231(c)	4
1				Adequate management of surface water and control of erosion and sedimentation.	297.232(1)-(3)	4
	2			Soil and groundwater monitoring conducted as required.	297.233	4
	2			Restoration of water supply adversely affected by operator.	297.234(a)-(c)	4
				SAFETY AND OPERATIONS		
		3		Operational safety plan on-site and implemented.	297.241(a)-(c)	4
1				Facility ventilated in a manner consistent with Section 297.218 (relating to air resources protection).	297.241(d)	4
		3		At least one set of up-to-date as-built construction drawings and up-to-date equipment operation and maintenance manuals on-site.	297.242(a), (b)	4
				EMERGENCY PROCEDURES		
1				Facility operated and maintained to prevent and minimize potential for fire, explosion, or environmental release.	297.251	4
1				Internal communication or alarm system operable.	297.252(a)(1)	4
1				Communications systems capable of summoning emergency assistance from outside agencies.	297.252(a)(2)	4
1				Adequate fire and safety equipment available, maintained and accessible.	297.252(a)(3), (c), (d)	4
		3		Contingency plan implemented in emergency.	297.253(a)-(c)	4

ID Number 301271

Date 8/6/97

INSPECTION REPORT - RESIDUAL WASTE INCINERATORS AND OTHER PROCESSING FACILITIES (Cont'd)

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS 1	2	3	4	RECORDKEEPING/REPORTING	CHAPTER CITATION	
1				Daily and annual operational records maintained, available and submitted as required. SEE COMMENTS	297.261(a)-(c) 297.262(a)-(c)	4
	2			Alternate facility available during temporary shutdown.	297.271(a), (b)	4
	2			Removal of all solid waste and structures or other materials which contain or are contaminated with solid waste upon cessation of operations.	297.272(a)-(c)	4
				BONDING AND INSURANCE REQUIREMENTS		
1				Bond filed with Department	287.312(a)	4
1				Bond maintained in an amount and with guarantees as required. Bond amount $ 20,270.00 Phased deposit due date — . (*)	287.333(a)	4
1				Proof of a commercial policy of liability insurance submitted to the Department as specified by 287.373 (Proof insurance coverage) Policy No.: LAB-26608 Insurer (Company Name): Indemnity Insurance Co of N.A. Expiration Date:	287.371(a)	4
1				Insurance coverage maintained continuously in full force.	287.375(a)	44
				INTERIM OPERATING REQUIREMENTS		
	2			**UNPERMITTED FACILITIES (UNTIL PERMITTED)**		
	2			No new wastes processed after July 4, 1992.	287.114(c)(1)	44
	2			No expansion of capacity after July 4, 1992.	287.114(c)(4)	44
	2			**PERMITTED FACILITIES (until repermitted after July 4, 1992).**		
	2			No increase in average daily volume beyond that which existed as of July 4, 1992 (unless authorized in writing from the Department.)	287.116(c)(3)	45
	2			No change in the method or technology used to process waste from that which was employed on July 4, 1992 (unless authorized in writing from the Department.)	287.116(c)(4)	45

ER-WM-129: Rev. 12/93

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection August 6, 1997 Identification Number PAD987333481

Site Name Ashland Chemical Co.

On site to conduct routine generator inspections (hazardous and residual), and a permitted residual waste incinerator inspection. Representing Ashland was Ron Marshalik and Gene Turoczy; representing the Department was Kathy Watson and myself.

Ashland Chemical Co. is a manufacturer of polyester resins and maleic anhydride. It has been operating as Ashland for approximately 2 years since the buy-out from Aristech. Hazardous wastes include off-spec/contaminated raw materials (off-spec product is blended and sold as such), material contaminated with maleic and/or phthalic anhydride and lab waste and solvents. Residual wastes include general plant trash, solidified resin, river mud from cooling tower water, and waste water from the polyester resin process. Ashland has claimed coproduct status for maleic acid residue for use as a pH adjuster for Aristech's WWT plant. It is the waste water for which Ashland has an incinerator permit (301291).

During this visit the following documents/records were reviewed: PPC plan, Source Reduction Strategy, employee training records, inspection records, manifests for 1997 and hazardous and residual biennial reports. All appeared to be in good order.

During the site tour, the following observations were made:
- The facility was well maintained and clean and appears to conform to state environmental regs.

- The tank that stores the waste water destined for incineration has a 15,000 gallon capacity; volume stored in the tank is measured in inches of mercury. The permit allows for storage of 11,000 gallons to be stored on site. It was difficult to determine the current amount contained in the tank due to conversion of units of measurement. Recommend Ashland consider a method of measurement which would easily indicate that the 11,000 gallon storage limit set by the permit is being maintained; a permit modification may also be an option to align the units of measurement between equipment being use and what is written in the permit.

- Ashland monitors only the amount of waste water generated, and uses these numbers for the amount of waste incinerated; there are no records for the pounds of waste water incinerated per hour as required by the permit. The permitted limit is 1000 pounds per hour. In October 1996, Ashland reported on their biennial report, treating 354 tons of waste water. Assuming the incinerator operated for 24 hours each of the 31 days of October, Ashland would have burned at a rate of 951.6 pounds/hour; or within the permit limit by 48.4 pounds/hour (approx. 6 gallons) for each hour of continued operation for the month of October. These figures do not allow for confidence that the permit conditions are being met. Recommend Ashland employ a method of determining hourly feed rate and maintain records of such.

- Two drums of hazardous waste were noted to be in the accumulation area without accumulation dates; G. Turoczy immediately dated the drums; he had accurate knowledge about when the drums were moved there from there satellite areas based on his recent inspection.

§287.421(b)(2) requires incinerator inspections twice each year. The above issues will be reevaluated during the second visit.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) sent Date 8/11/97

Inspector (signature) Rhonda Date August 8, 1997

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028 Expires 9-30-95
GSA No. 3246-EPA-01

Please refer to the *Instructions for Filling Notification* before completing this form. The information requested here is required by law (Section 3010 of the *Resource Conservation and Recovery Act*).

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

NC 6

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[X] A. First Notification [ ] B. Subsequent Notification *(Complete item C)*

C. Installation's EPA ID Number: PAD987333481

II. Name of Installation *(Include company and specific site name)*

ASHLAND CHEMICAL COMPANY

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: NEVILLE ANT

Street (Continued): 2650

City or Town: PITTS

State: PA Zip Code: 15225-1696

County Code: 003 County: AL

OLD NAME IS
ARISTECH POLYESTER TECH GROUP

NEW NAME IS
ASHLAND CHEMICAL COMPANY

IV. Installation Mailing

Street or P.O. Box: 5200 AY

City or Town: DUBLI

State: OH Zip Code: 43017-

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name (Last): GEBHARDT (First): DON

Job Title: ENV ENGINEER

Phone Number (Area Code and Number): 614-790-4244

VI. Installation Contact Address *(See Instructions)*

A. Contract Address Location [ ] Mailing [X] Other [ ]

B. Street or P.O. Box: 5200 BLAZER PARKWAY

City or Town: DUBLIN

State: OH Zip Code: 43017-

VII. Ownership *(See Instructions)*

A. Name of installation's Legal Owner: ASHLAND INC

Street, P.O. Box, of Route Number: 1000 ASHLAND DRIVE

City or Town: RUSSELL

State: KY Zip Code: 41169-

Phone Number (Area Code and Number): 606-329-3333

B. Land Type: P

C. Owner Type: P

D. Change of Owner Indicator: Yes [X] No [ ]

(Date Changed) Month: 04 Day: 28 Year: 95

Continued on Reverse

Please print or type

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes; Refer to Instructions)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [X] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (200-2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [X] a. For own waste only
   - [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [ ] 3. Highway
- [ ] 4. Water
- [ ] 5. Other - specify

3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Boiler and/or Industrial Furnace
     - [ ] 1. Smelter Deferral
     - [ ] 2. Small Quantity Exemption

Indicate Type of Combustion Device(s)
- [ ] 1. Utility Boiler
- [ ] 2. Industrial Boiler
- [ ] 3. Industrial Furnace

5. [ ] Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
   - [ ] a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
   - [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
   - [ ] a. Utility Boiler
   - [ ] b. Industrial Boiler
   - [ ] c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
   - [ ] a. Transporter
   - [ ] b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
   - [ ] a. Process
   - [ ] b. Re-refine

IX. Description of Hazardous Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
X	X		X	D006, D007, D008

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
U028	U147	U151	U162	U190	U226
7	**8**	**9**	**10**	**11**	**12**
F001	F003	F005			

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
Larry A Baker	VICE PRESIDENT AND GENERAL MANAGER ASHLAND COMPOSITE POLYMERS DIVISION	4/28/95

XI. Comments

~~Former~~formerly Aristech Polyester Tech Group

BAA/dek 5/30/95

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

EPA Form 8700-12 (Rev. 11-30-93) Previous edition is obsolete.

Ashland Chemical

Environmental, Health & Safety
G. W. Hammer
Vice President
(614) 790-3052

Ashland Chemical Company
Division of
Ashland Inc.

Address Reply:
P.O. Box 2219
Columbus, OH 43216
Fax: (614) 790-6080

April 28, 1995

RCRA Program Branch (3 HW51)
Attn: Dorthy Haug
841 Chestnut Street
Philadelphia, PA 19107

RE: First Notification of Regulated Waste Activity, EPA form 8700-12

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Dear Ms. Haug:

Ashland Chemical Company ("Ashland") will be acquiring certain operating units of Aristech Chemical's facility located at ~~200 Neville Road on Neville Island,~~ PA. Under the agency's direction, we have completed the Notification of Regulated Waste Activity form 8700-12, reflecting the change in ownership from Aristech to Ashland. Please note that Aristech will be continuing certain operations at the Neville Island plant, and will thus need to retain their assigned EPA ID number. We will thus need a new EPA ID number for our operations. Ashland's plant office (2650 Neville Road, Pittsburgh, PA), which is attached to the plant site, will be the address for Ashland operations at the Neville, Island plant. This new address for Ashland's portion of the Neville Island operation is noted on the enclosed 8700-12 form.

If you require any further information, please contact me at any time at our Corporate Headquarters in Dublin, Ohio. My number is (614)790-4277 and Dublin is located in the eastern time zone. Thank you for your consideration of this important matter.

Sincerely yours,

Don E Gebhardt

Don Gebhardt
Environmental Engineer.
Water/Waste Concerns

attachment

cc: Mr. D. Drummond, plant manager, Neville Island CPD
Mr. Michael Froman, manufacturing manager, Dublin CPD
Ms. Lisa Cilli, DA5
file: CPD/Neville Island/Waste/1995

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

PAD987333481 05/31/95

INSTALLATION ADDRESS

ASHLAND CHEM CO
5200 BLAZER PKWY
DUBLIN, OH 43017
DON GEBHARDT ENV ENGINEER

2650 NEVILLE RD
PITTSBURGH, PA 152251696

EPA Form 8700-12A (6-90)

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

RECEIVED PADC SEC OCT 13 1993

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

[X] A. First Notification [ ] B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number: PAD 987 333 481

II. Name of Installation (Include company and specific site name)

ARISTECH POLYESTER TECH. GROUP

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: 2650 NEVILLE RD

Street (continued):

City or Town: PITTSBURGH | State: PA | ZIP Code: 15225-

County Code: | County Name: ALLEGHENY

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box: SAME

City or Town: | State: | ZIP Code: -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last): MC NALLY | (first): JOHN

Job Title: TECHNICAL MGR | Phone Number (area code and number): 412-778-3503

VI. Installation Contact Address (See Instructions)

A. Contact Address Location [X] Mailing [ ] | B. Street or P.O. Box:

City or Town: | State: | ZIP Code: -

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner: ARISTECH CHEMICAL CORP

Street, P.O. Box, or Route Number: 600 GRANT ST

City or Town: PITTSBURGH | State: PA | ZIP Code: 15219-2704

Phone Number (area code and number): 412-433-2747 | B. Land Type: P | C. Owner Type: P | D. Change of Owner Indicator: Yes [ ] No [ ] | (Date Changed) Month Day Year:

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only.

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [ ] a. Greater than 1000kg/mo (2,200 lbs.)
   - [X] b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

   Mode of Transportation
   - [ ] 1. Air
   - [ ] 2. Rail
   - [ ] 3. Highway
   - [ ] 4. Water
   - [ ] 5. Other - specify
3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
5. [ ] Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Markerer
   - [ ] c. Burner - Indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
2. [ ] Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. EP Toxic (D000)	(List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))
[X]	[ ]	[ ]	[X]	D009 D038

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
F003	F005				
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
John S McNally	JOHN McNALLY, TECHNICAL MGR	OCT 6, 93

BB 11/16

XI. Comments

SUBMITTED PER CONVERSATION BETWEEN MARGARET THORNTON (REGION III) AND RICK HARRIS (ARISTECH) REGARDING I.D. NO. PAD 987 333 481.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

PAD987333481

ARISTECH POLYESTER TECH GROUP
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